

REMARKS

In this response, all independent claims have been amended and new dependent claims (97-100) have been added.

All of the claims were rejected under section 103(a) as being unpatentable over a combination of references, with the primary combination being Tso (US 6,072,598) and Magallanes (US 5,925,103).

Applicant submits that the Examiner is improperly using hindsight reconstruction to attempt to show all elements of the claims. The Tso-Magallanes combination is a contrived combination which does not make sense. The last Office Action stated, on lines 7-10 of page 19, that “[T]herefore, an artisan having the teachings of Tso of rendering fax documents for communication over the network to a PDA would find it obvious to also render active web documents. The same OCR techniques could be used by the artisan to render web pages as was used for faxes in order to convert documents into a format recognized by the PDA.” No artisan in the art would retrieve a web page and then perform OCR on it; there is no need to do so because the web page is already in a machine readable form, such as HTML. Thus, it is not reasonable to combine a reference which receives faxes (as an image) and which performs OCR on the received fax image with another reference which provides access to web pages. For at least this reason, the combination is improper, and the claims are patentable. The Office Action is attempting to modify the combination in a way which is incompatible with both references.

A fax in Tso is an image (e.g. an image generated by a fax machine 10 in Tso). Tso describes how, in order to view the fax on a PDA, to process the fax image on a computer system (e.g. system 30 in Tso) to recognize text (through the OCR process which converts an

image having pixels NOT recognized initially to text which can be represented in ASCII code). The text (e.g. in the form of ASCII code) is transmitted in a data file to the PDA for display. According to Tso, the recognized text, received in a machine readable form (e.g. ASCII code), is rendered at the destination device (e.g., see, col. 2, lines 19-21 of Tso). This is clearly the opposite at least certain embodiments of the invention, in which the server renders the HTML web page at the server into a bitmap which is compressed, and the compressed bitmap is transmitted from the server to the device which does not need to render the web page.

It is also noted that Magallanes does not disclose rendering at the server and does not disclose rendering on entire image which is larger than the display area on the remote device and does not describe displaying only part of the entire image.

Using a computer to recognize text in an image (performing OCR) for a PDA is completely different from using a host computer to render a document, which includes text, into an image containing unrecognized pixels. Further, the fax image from the fax machine of Tso does not have web links and does not have vector information including text.

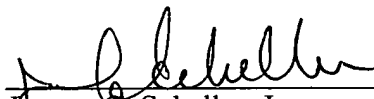
Thus, even if Tso and Magallanes were combined as suggested by the Office Action, the combination does not have each and every limitation of the claims. In the combination, the computer of Tso would perform OCR to recognize text from the fax image, which is the opposite of rendering an image from a document with text or a document with text and one or more links. The requested document in the Tso-Magallanes combination would be a fax image, which includes neither text with one or more links nor vector information including text. Although Magallanes mentioned Internet access, the combination with Tso would retrieve fax images and then perform OCR on them to recognize text. Thus, the combination does not establish a *prima facie* case of obviousness. For at least the above reasons, withdrawal of the rejections for all claims is respectfully requested.

Applicant hereby petitions for an extension of time to respond, and a check for the extension fee is enclosed. Please charge deposit account 02-2666 for any shortage in fees associated with this response.

Respectfully submitted,

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